

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

Tommy Ray Mays II and Quinton Nelson,
Jr., on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

Frank LaRose, in his official capacity as
Secretary of State,

Defendant.

Case No. 2:18-cv-1376

JUDGE MICHAEL H. WATSON
Magistrate Judge Chelsey M. Vascura

CLASS ACTION

DECLARATION OF MARK J. SALLING

I, Mark J. Salling, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. The testimony set forth in this Declaration is based on first-hand knowledge, about which I could and would testify competently in open Court if called upon to do so. This Declaration is submitted in support of Plaintiffs' Motion for Summary Judgment.

2. I am Senior Fellow and Research Associate at the Northern Ohio Data and Information Service (NODIS) and Maxine Goodman Levin College of Urban Affairs at Cleveland State University. I have been retained to provide expert testimony in the above-captioned action by counsel for Plaintiffs.

3. A true and correct copy of my report titled "Analysis of the Proximity of Jails and Hospitals to County Boards of Elections in Ohio" dated April 12, 2019 is attached herein as Exhibit 1.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 22, 2019.

Mark J. Salling

